

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Cynthia L Berry & Anthony D Berry Case No. 18 B 23255 Chapter 13

All Cases: Moving Creditor AmeriCredit Fin. Svcs. Inc., d/b/a GM Financial Date Case Filed 8/17/18

Nature of Relief Sought: Lift Stay Annul Stay Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 10/19/18

Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. Home
 - b. Car Year, Make, and Model 2014 Buick Enclave
 - c. Other (describe) _____
2. Balance Owed as of Petition Date \$ 33,554.06
Total of all other Liens against Collateral \$ _____
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 15,225.00
5. Default
 - a. Pre-Petition Default
Number of months _____ Amount \$ _____
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. Lack of Adequate Protection § 362(d)(1)
 - i. No insurance
 - ii. Taxes unpaid Amount \$ _____
 - iii. Rapidly depreciating asset
 - iv. Other (describe) _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. Other “Cause” § 362(d)(1)
 - i. Bad Faith (describe) _____
 - ii. Multiple Filings
 - iii. Other (describe) _____ Plan amended to surrender vehicle
 - d. Debtor’s Statement of Intention regarding the Collateral
 - i. Reaffirm
 - ii. Redeem
 - iii. Surrender
 - iv. No Statement of Intention Filed

Date: 4/9/21 /s/ Cari A. Kauffman
Counsel for Movant